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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215993
Party	Defendant Karma Champagne, Inc.
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Submission	Answer
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Date	06/02/2014
Attachments	Answer to Opposition.GE1.pdf(21349 bytes)

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Attorneys for Applicant
KARMA CHAMPAGNE, INC.

**UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD**

KARMA CULTURE, LLC,
Opposer,

v.

KARMA CHAMPAGNE, INC.,
Applicant.

Opposition No.: 91215993

Mark: KARMA CALIFORNIA BRUT
Serial No.: 77876479

ANSWER TO OPPOSITION

Applicant Karma Champagne, Inc. ("Applicant"), owner of U.S. Trademark Application for "KARMA CALIFORNIA BRUT," Serial No. 77876479, hereby answers the Notice of Opposition opposing the registration of said mark filed by Opposer Karma Culture, LLC ("Opposer") as follows:

1. Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in paragraph 1 and therefore they are denied.
2. Deny.
3. Admit.
4. Admit
5. Admit.
6. Admit.

1 7. Applicant lacks sufficient information to form a belief as to the truth
2 or falsity of the allegations set forth in paragraph 7 and therefore they are denied.

3 8. Applicant lacks sufficient information to form a belief as to the truth
4 or falsity of the allegations set forth in paragraph 8 and therefore they are denied.

5 9. Applicant lacks sufficient information to form a belief as to the truth
6 or falsity of the allegations set forth in paragraph 9 and therefore they are denied.

7 10. Applicant lacks sufficient information to form a belief as to the truth
8 or falsity of the allegations set forth in paragraph 10 and therefore they are denied.

9 11. Applicant lacks sufficient information to form a belief as to the truth
10 or falsity of the allegations set forth in paragraph 11 and therefore they are denied.

11 **CLAIM FOR RELIEF UNDER 15 U.S.C. § 1052(d)**

12 **LIKELIHOOD OF CONFUSION**

13 12. Applicant hereby repeats and incorporates its responses to paragraphs
14 1 through 11 as though set forth fully herein.

15 13. Deny.

16 14. Deny

17 15. Deny

18 16. Deny

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20 Additionally, Applicant denies that Opposer will be damaged by the
21 registration of U.S. Trademark Application for “KARMA CALIFORNIA BRUT,”
22 Serial No. 77876479. Applicant respectfully requests that the Board deny the
23 Notice of Opposition, Opposition No. 91215993, and permit registration of U.S.
24 Trademark Application for “KARMA CALIFORNIA BRUT,” Serial No.
25 77876479.
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1 Dated: June 2, 2014

EASTMAN & MCCARTNEY LLP

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3 By /s/ Gary L. Eastman
4 Gary L. Eastman, Esq.
Attorneys for Applicant
KARMA CHAMPAGNE, INC.
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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer to Opposition has been served on the Opposer Karma Culture, LLC by mailing a copy of the same on June 2, 2014 via First Class Mail, postage prepaid to:

Katherine H. McGuire, Esq.
Woods Oviatt Gilman LLP
2 State Street700 Crossroads Building
Rochester, NY 14614

Executed in San Diego, California on June 2, 2014.

By_ /s/ Gary L. Eastman